

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF NEW YORK

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ECP PROPERTY II LLC

Plaintiff,

RULE 26 (A)(1)

-against-

INITIAL DISCLOSURES

JOSEPH NORTON, Et al

14-CV-7298 (FB)(PK)

Defendant

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DEFENDANT’S RULE 26(A)(1) INITIAL DISCLOSURES

Defendants, Joseph Norton and Thema Norton (“Norton”), makes the following disclosures pursuant to Federal Rule of Civil Procedure (26)(a)(1):

(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Joseph Norton  
771 Thomas S Boyland Street  
Brooklyn, NY 11212
2. Thema Norton  
771 Thomas S. Boyland Street  
Brooklyn, NY 11212
3. President of ECP Property II LLC
4. Accountant or book keeper of ECP Property II LLC

(B) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its

possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Various lease agreements pertaining to the subject property;
2. Various rent ledgers regarding the subject property;
3. Expenses or contractor bills regarding the subject property; and
4. Documents regarding the foreclosure matter in State Court.

(C) A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 of the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extend of injuries suffered.

N/A

(D) For inspection and copying as under Federal Rule of Civil Procedure 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

N/A

#### CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel or record identified on the attached service list in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner of those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

To: Gordon S. Young, Esq  
Leitess Friedberg PC  
10451 Mill Run Circle, Suite 1000  
Baltimore, MD 21117

Dated: December 16, 2015

Respectfully submitted

New York, New York

/s/ Narissa Joseph

Law Office of Narissa A. Joseph  
277 Broadway, Suite 501

New York, NY 10007

Telephone: 212-233-3060

Facsimile: 212-608-0304

Attorneys for Defendants